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D.2801 Westwood, Inc. d/b/a Treasures

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

Plaintiff,

v.

Case No.: 2:09-cv-00995

BIG POPPA'S, LLC, A Nevada limited liability company d/b/a BADDA BING MEN'S CLUB; SKY TOP VENDING, INC., a Nevada Corporation d/b/a CAN CAN ROOM; LA FUENTE, INC., a Nevada corporation d/b/a CHEETAH's; C.P.FOOD AND BEVERAGE, INC., a Nevada corporation d/b/a CLUB PARADISE; DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a DÉJÀ VU SHOWGIRLS; PALOMINO CLUB, INC.; SHAC, LLC, a Nevada limited liability company d/b/a SAPPHIRE; K-KEL, INC., a Nevada corporation d/b/a SPEARMINT RHINO; D.2801 WESTWOOD, INC., a Nevada corporation d/b/a TREASURES; LITTLE DARLINGS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a LITTLE DARLINGS; O.G. ELIADES, A.D., LLC, a Nevada limited liability company d/b/a OLYMPIC GARDENS; LAS VEGAS ENTERTAINMENT, LLC, a Nevada limited liability company d/b/a LARRY FLYNT's HUSTLER CLUB; MICHAEL A. SALTMAN d/b/a MINXX; RICK'S LAS VEGAS; FRIAS MANAGEMENT, LLC, a Nevada limited liability company d/b/a ACE CAB COMPANY and A-NORTH LAS VEGAS CAB; WESTERN CAB COMPANY, a

**DEFENDANT D.2801 WESTWOOD, INC.
d/b/a TREASURES DEMAND FOR
SECURITY OF COSTS**

1 Nevada corporation d/b/a WESTERN CAB
2 COMPANY and WESTERN LIMOUSINE,
3 NEVADA CHECKER CAB
4 CORPORATION, a Nevada corporation d/b/a
5 CHECKER CAB COMPANY;; NEVADA
6 STAR CABCORPORATION, a Nevada
7 corporation d/b/a STAR CAB COMPANY;
8 NEVADA YELLOW CAB CORPORATION,
9 a Nevada corporation d/b/a YELLOW CAB
10 COMPANY; LUCKY CAB COMPANY OF
11 NEVADA, a Nevada corporation d/b/a
12 LUCKY TRANS; SUN CAB, INC., a Nevada
13 limited liability company d/b/a CLS
14 TRANSPORTATION LAS VEGAS; ON
15 DEMAND SEDAN SERVICES, LLC, a
16 Nevada limited liability company d/b/a ODS
17 LIMOUSINE and ODS CHAUFFEURED
18 TRANSPORTATION; BLS LIMOUSINE
19 SERVICE OF LAS VEGAS, INC., a Nevada
20 corporation d/b/a BLS LIMOUSINE
21 SERVICE OF LAS VEGAS; DESERT CAB,
22 INC., a Nevada corporation d/b/a DESERT
23 CAB COMPANY and ODYSSEY
24 LIMOUSINE; BELL TRANS A NEVADA
25 CORPORATION, a Nevada corporation d/b/a
26 BELL TRANS; TONY CHONG, an
27 individual; and DOE EMPLOYEES 1-1000;

Defendants.

18 **TO: THEODORE TRAPP, Plaintiff; and**

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20 **TO: JAY EDELSON, ESQ., and RAFEY BALABANIAN, ESQ. of**
21 **Kamber Edelson, LLC, and JAMES SMYTH, ESQ., of**
22 **Kummer Kaempfer Bonner Renshaw & Ferrario, his**
23 **attorneys.**

24 Pursuant to NRS 18.130, Defendant D.2801 WESTWOOD, INC. d/b/a TREASURES,
25 hereby demands upon Plaintiff, who resides out of State, for security in the amount of Five
26 Hundred Dollars and 00/100 (\$500.00) for costs and charges which may be awarded herein
27 against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District
28 Court, District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988);

1 Hamar v. Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

2 Dated this 30th day of June, 2009.

3 GOODMAN LAW GROUP

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5 By: /s/ Ross C. Goodman
6 Ross C. Goodman, Esq. (Bar No. 7722)
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10 *D.2801 Westwood, Inc. d/b/a Treasures*
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CERTIFICATE OF MAILING

I hereby certify that I am and employee of the GOODMAN LAW GROUP, and that on the 30th day of June, 2009, I electronically transmitted the foregoing **DEFENDANT D.2801 WESTWOOD'S DEMAND FOR SECURITY OF COSTS** to the Clerk's Office using CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the counsel listed below, who have registered to receive Electronic Filing:

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/s/ Mary A. Guido
An Employee of the GOODMAN LAW GROUP